October 17, 2016

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Ex Parte Letter, Unlicensed National Information Infrastructure Devices in the 5 GHz Band, ET Docket No. 13-49

Dear Ms. Dortch:

The Association of Global Automakers ("Global Automakers") submits this *ex parte* to urge the Federal Communications Commission ("Commission") to end regulatory uncertainty regarding the availability of the full 5.9 GHz Dedicated Short Range Communications ("DSRC") allocation (the "Safety Spectrum") for the advancement of roadway safety in the United States. The record in this proceeding reflects that U.S. highway fatalities increased 7.2% last year, the highest increase since the 1960s.[1] And, as U.S. Department of Transportation's ("DOT") National Highway Traffic Safety Administration ("NHTSA") announced this month, the trend accelerated in the first half of 2016 with a 10.4% increase in traffic fatalities.[2] To address this alarming trend, the Executive Branch has identified the Safety Spectrum and DSRC as key assets in reducing the number and severity of crashes. Consistent with the Administration's plans for improving auto safety, which are set forth in the recently released Federal Automated Vehicle Policy ("AV Policy")[3] and White House statement on the safe deployment of automated vehicles,[4] the Commission should confirm the availability of the full Safety Spectrum allocation for existing and planned life-saving DSRC deployments.

The Obama Administration has released its vision for the future of automotive safety, and that vision depends on the continued availability of the Safety Spectrum for DSRC. As the Administration AV Policy recognizes,

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1 *See, e.g.,* U.S. Department of Transportation, National Highway Traffic Safety Administration, Research Note, *2015 Motor Vehicle Crashes: Overview* (August 2016).

2 *See*, U.S. Department of Transportation, National Highway Traffic Safety Administration, Traffic Safety Facts, *Early Estimate of Motor Vehicle Traffic Fatalities for the First Half of 2016* (October 2016).

3 U.S. Department of Transportation, National Highway Traffic Safety Administration, *Federal Automated Vehicles Policy: Accelerating the Next Revolution in Roadway Safety* (Sep. 2016).

4 *See, e.g.,* The White House, Statements and Releases, Fact Sheet, *Encouraging the Safe and Responsible Deployment of Automated Vehicles* (Sep. 19, 2016) *available at* https://www.whitehouse.gov/the-press-office/2016/09/19/fact-sheet-encouraging-safe-and-responsible-deployment-automated.

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automated vehicles can provide transformative benefits in auto safety.[5] DSRC-based systems are a near-term bridge to higher levels of safety automation and key to the Administration's plan for unlocking those benefits for all Americans. In fact, the AV policy emphasizes the role of vehicle-to-vehicle ("V2V") and vehicle-to-infrastructure ("V2I") systems in improving system performance in highly automated vehicles ("HAVs") and reducing the number and severity of crashes. The Policy notes V2V and V2I technologies have the "potential to reduce the number and severity of crashes" and that "inclusion of V2V and V2I capabilities could augment the safety and performance of HAV systems."[6]

In a separate statement, the White House broadly expressed its commitment to encouraging the safe and responsible deployment of automated vehicles, which can "help[] prevent the vast majority of car crashes that result from human error or judgment and saving tens of thousands of lives in the United States."[7] Further emphasizing the importance of DSRC for the Administration's plans, the statement notes that NHTSA will be releasing a proposed rule to mandate V2V safety communications in all new vehicles.[8] To clear the path for the Administration's plans, the Commission should move expeditiously to confirm the availability of the Safety Spectrum for DSRC.

Considerable strides have been made in deploying DSRC technology under the existing 5.9 GHz channel plan. Life-saving DSRC technologies are being deployed, and more will be deployed in the near future. As noted in the auto industry's DSRC refresh comments, which the Global Automakers joined, manufacturers, states, universities, researchers and infrastructure firms are pioneering the DSRC ecosystem now.[9] In addition, we look forward to reviewing NHTSA's proposed rules on DSRC technology for new vehicles. Realization of the full potential of existing and future DSRC deployments depends on continued access to the Safety Spectrum. Accordingly, the Commission should act expeditiously to confirm the availability of the full Safety Spectrum allocation for DSRC consistent with the Administration's roadmap for autonomous vehicle development to increase the safety of America's roadways.

Best regards,

John T Bozzella
President & Chief Executive Officer
Association of Global Automakers

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5 *See supra,* n.3. The AV Policy also notes that automated vehicles could provide transformative benefits in other areas such as safety, mobility, productivity, and sustainability.

6 *Id.*

7 *See supra,* n.4.

8 *Id.* ("DOT will be releasing a rule to mandate that new vehicles have technology to transmit and receive a basic safety message.")

9 *Reply Comments of the Alliance of Automobile Manufacturers, Association of Global Automakers, Intelligent Transportation Society of America, and DENSO International America, Inc.*, ET Docket No. 13-49 filed July 22, 2016).